CHARLES E. MILLER

NO.

24,747

EQU I TY

COMPLAINANT

IN THE CIRCUIT COURT FOR

vs.

FREDERICK COUNTY, MARYLAND

ROSALIE I. MILLER and ROBERT E. MILLER, JR.,

AN INFANT

RESPONDENTS

TO THE HONORABLE, THE JUDGES OF SAID COURT:

Now comes Rosalie I. Miller, Respondent, by W. Jerome Offutt and William L. Haugh, Jr., her attorneys, and moves for the appointment of an attorney for her infant son, Robert E. Miller, Jr., a person under disability. The grounds of the Motion are as follows:

- 1. This is an action seeking partition of certain real estate.
- 2. That your Movant is the owner of a one-ninth interest in said real estate and that the Respondent, Robert E. Miller, Jr., an infant, is also the owner of a two-ninth interest in said real estate.
- 3. That the said Robert E. Miller, Jr., an infant, was born on October 26th, 1957.
- 4. That the said Robert E. Miller, Jr., an infant, has been duly served with process pursuant to the Maryland Rules of Procedure.
- 5. Under the foregoing circumstances, Maryland Rule 205 e 2 permits this court to appoint an attorney to represent the person under disability.
- 6. Your Movant suggests W. Jerome Offutt and William L. Haugh, Jr. to represent the said Robert E. Miller, Jr. and avers that said attorneys have no interest whatever adverse to the Respondent under disability.

LAW OFFICES

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